



# ANTI-BRIBERY & CORRUPTION POLICY

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## Anti-Bribery & Corruption Policy

Dewick & Associates is committed to conducting business with integrity, transparency, and accountability.

We have a **zero-tolerance approach** to bribery and corruption and are committed to complying with all applicable anti-bribery laws in the countries in which we operate.

This policy aligns with key global legislation, including the **UK Bribery Act 2010**, **Criminal Code Act 1995** (Australia), **Corporations Act 2001** (Australia), the **Canada Business Corporations Act**, and the **Criminal Code of Canada**.

Dewick & Associates also recognises international best practice, including guidance from the Transparency International.

## Definitions

Bribery is offering, promising, giving, or accepting something of value to improperly influence a business decision.

This may include:

- Cash payments
- Gifts or hospitality
- Travel, entertainment, or services
- Job offers or other personal benefits

We prohibit all forms of bribery and corruption, whether direct or indirect.

This includes:

- Offering, giving, or receiving bribes
- Facilitation payments (unless legally permitted and unavoidable for personal safety)
- Improper gifts, hospitality, or benefits intended to influence decisions
- Any conduct that could create the appearance of improper influence



## Responsibilities

This policy applies to:

- All employees (full-time, part-time, casual)
- Any third party acting on behalf of Dewick & Associates

It applies to all business activities globally.

All employees must:

- Act with integrity at all times
- Comply with this policy
- Report any concerns promptly
- Reporting Concerns

All employees are encouraged to report suspected bribery or corruption.

- Reports can be made to:
- Line Manager
- General Manager

Examples of concerns include:

- Requests for unofficial payments
- Unusual or excessive gifts or hospitality
- Suspicious third-party behaviour

## Protection for Whistleblowers

Dewick & Associates will:

- Treat all reports confidentially
- Protect individuals from retaliation when concerns are raised in good faith

## Breaches of This Policy

Breaches may result in:

- Disciplinary action (including termination)
- Termination of contracts with third parties
- Reporting to relevant authorities